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MEMO ENDORSED

March 5, 2021

VIA ECF & EMAIL

Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007
Failla_NYSDChambers@nysd.uscourts.gov

Re: *Ideavillage Products Corp. v. Copper Compression Brands LLC et al*
Civil Action No. 20-cv-04604-KPF
Joint Letter Motion Requesting Extension of Remaining Discovery Deadlines &
Adjournment of Pretrial Conference

Dear Judge Failla:

In accordance with Your Honor's Individual Rules of Practice in Civil Cases, specifically Rule 2(D), the parties to the above case, through their respective counsel, are writing to jointly request a three (3) month extension of all remaining discovery deadlines, as reflected on the [Proposed] Revised Scheduling Order submitted herewith, and an adjournment of the pretrial conference, currently scheduled for April 15, 2021 at 10:00 AM to July 15, 2021 at 10:00 AM, or whenever is convenient for the Court. The parties previously sought an extension of the following deadlines, and all such requests were granted by the Court: the time for Defendants to respond to the Amended Complaint (*Docket Entry Nos. 21-22*), and the time for the parties to complete a settlement conference (*Docket Entry Nos. 35-36*). Defendants also requested an adjournment of the initial pretrial conference, which was likewise granted by the Court (*Docket Entry Nos. 26-27*). This is the parties' first request for an extension of any of the discovery deadlines set forth in the Civil Case Management Plan and Scheduling Order (*Docket Entry No. 43*) and an adjournment of the pretrial conference. The parties timely served discovery requests and responses; however, the parties' document production remains ongoing. Given the broad scope of discovery, and in order to permit the parties adequate time to diligently gather and produce all responsive, relevant documents, and for depositions to occur thereafter, the parties respectfully submit that there is just cause for the extension and adjournment sought herein.

We thank the Court for its time and consideration.

Respectfully submitted,

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Application GRANTED, with the condition that no further extensions of discovery will be granted under any circumstances. The deadline for fact discovery is hereby extended to **April 8, 2021**. The deadline for expert discovery is hereby extended to **May 24, 2021**. The conference scheduled for April 15, 2021, is hereby ADJOURNED to **May 25, 2021, at 10:00 a.m.** At the appointed time, the parties shall call 888-363-4749 and enter access code 5123533.

Dated: March 5, 2021
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE